IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

MARICULTURA DEL NORTE, S. DE R.L.

DE C.V. et al.,

Plaintiffs,

NOTICE OF MOTION TO REOPEN

V.

AND REDUCE THE AMENDED

JUDGMENT AND THE

WORLDBUSINESS CAPITAL, INC., et al.,

Defendants.

X

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and the accompanying Declarations of Rodrigo Zamora and Alfredo Gustavo Servin Padilla, and the exhibits thereto, and the Affirmation of Martin S. Siegel and the exhibits thereto, Defendant Umami Sustainable Seafood, Inc., will move this Court before the Honorable Colleen McMahon, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY, at a date and time in accordance with the Rules of the Southern District of New York and Hon. Colleen McMahon's Individual Practices and Procedures, for an Order pursuant to Fed. R. Civ. P. Rule 60 to reopen and reduce the Amended Judgment and the Supersedeas Bond, and for such other and further relief as the Court may determine to be just and proper.

Dated: August 21, 2019

Respectfully submitted,

Martin S. Siegel

Golenbock Eiseman Assor Bell

& Peskoe LLP

711 Third Avenue, 17th Floor

New York, NY 10017

(212) 907-7300 (Telephone)

(212) 754-0330 (Facsimile)

msiegel@golenbock.com

Bruce W. Bieber Kurzman Eisenberg Corbin & Lever LLP 1 North Broadway, 12th Floor White Plains, New York 10601

Counsel for Umami Sustainable Seafood, Inc.

To: Jacob C. Cohn, Esq.
Ilan Rosenberg
Gordon & Rees LLP
One Commerce Square
2005 Market Street, Suite 2900
Philadelphia, PA 19103
(215) 561-2300 (Telephone)
(215) 693-6650 (Facsimile)
jcohn@gordonrees.com
irosenberg@gordonrees.com